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May 11, 2010
(PBW Project No. 1597B)

VIA HAND DELIVERY

Mr. Tres Koenings
Texas Commission on Environmental Quality
Building F
12100 Park 35 Circle
Austin, TX 78753

Re: Supplement Information for Industrial Wastewater Permit Application Abbreviated
Technical Report
Gulfco Marine Maintenance Superfund Site, Freeport, Texas

Dear Mr. Koenings:

Per your request of May 6, 2010, please find enclosed supplemental information related to our April 27, 2010 Industrial Wastewater Permit Application Abbreviated Technical Report for discharge of accumulated water within an aboveground storage tank (AST) Tank Farm containment area at the above-referenced Site. Pastor, Behling & Wheeler, LLC (PBW) is submitting this information on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow). As we discussed, the supplemental information includes a USGS map (Figure 1) with specific labeled items that you requested. To augment the items shown on the map and provide the information that you specified, I have also enclosed a table listing identified public water supply wells within a one-mile radius of the proposed discharge location (Table 1) and a figure showing Site monitoring well locations (Figure 2).

Thank you for the opportunity to submit this supplemental information. I appreciate expedited review of this information and the technical report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.
Principal Engineer

Enclosures



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cc: Ms. Luda Voskov – Texas Commission on Environmental Quality
Mr. Gary Miller – US Environmental Protection Agency
Mr. Ray Merrell – Sequa Corporation
Mr. Brent Murray – Environmental Quality, Inc.
Mr. Donnie Belote - The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morriss III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP

**TABLE 1 - PUBLIC WATER SUPPLY WELLS WITHIN ONE MILE OF PROPOSED DISCHARGE
AS LISTED IN TWDB AND TCEQ RECORDS**

State Water Well ID ¹	Reported Total Depth (feet)	Reported Completion Date	Well Owner of Record	Field Verification/Current Status
81-06-3E	435	3/3/1982	Surfside Water Works	Not Present based on field survey - Appears to be incorrectly located in well records.
81-06-206 / 81-06-207	243	1/1/1962	Freeport Marina	Present - Reported to be capped and not in use (per Freeport LNG, 2004 ³).
81-06-5J	258	10/10/1978	Russel & Son, Inc.	Not Present based on field survey - Appears to be incorrectly located in well records.
81-06-606	250	11/29/1982	Village of Surfside	
81-06-301	300	1/1/1958	Village of Surfside	
81-06-304	435	3/3/1982	Village of Surfside	

Notes:

¹Location identification on Figure 1.

² Search of Texas Water Development Board and Texas Commission on Environmental Quality records performed by Banks Information, Inc. (May 10, 2010).

³Freeport LNG Development, L. P. (Freeport LNG), 2004. Final Environmental Impact Statement, Freeport LNG Project. Docket No. CP03-75-000 FERC/EIS – 0164, May.



EXPLANATION

- | | |
|---|-------------------------------------|
| — Gulfco Marine Maintenance Site Boundary (approximate) | ● Monitoring Well Location - Zone B |
| ● Previous Monitoring Well Location | ○ Monitoring Well Location - Zone C |
| ⊕ Monitoring Well Location - Zone A | |

Source of photo: H-GAC, Texas aerial photograph, 2006.

GULFCO MARINE MAINTENANCE FREEPORT, BRAZORIA COUNTY, TEXAS

Figure 2
**SITE MONITORING
WELL LOCATIONS**

PROJECT: 1597	BY: ZGK	REVISIONS
DATE: MAY, 2010	CHECKED: EFP	

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